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March 12, 2025

VIA ECF

Honorable Frederic Block
Senior U.S. District Court Judge
U.S. District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Teamsters, Local 804 v. City of New York, et al.
Civil Action No. 24-08683 (FB-TAM)

Dear Judge Block:

We represent Intervenor-Defendant Amazon.com Services LLC ("Amazon") in the above-referenced action. We write in accordance with Your Honor's March 11, 2025 Order scheduling a pre-motion conference related to anticipated motions to dismiss for March 20, 2025. (ECF No. 38.)

We write with the consent of all parties to advise that Amazon and NYC Defendants are not available on March 20, 2025 due to arbitration and trial in other matters. All parties are available on April 3, 2025, and the parties respectfully request the Court reschedule the pre-motion conference to April 3, 2025.

Amazon and NYC Defendants renew their requests that the briefing schedule for Plaintiffs' Motion for Preliminary Injunction be stayed pending determination of motions to dismiss. (See ECF Nos. 36 and 37.) As stated in Amazon's and NYC Defendants' respective March 10 letters, Plaintiffs' Motion for Preliminary Injunction is moot and the grant of motions to dismiss would obviate the Court's need to consider Plaintiff's Motion for Preliminary Injunction. Plaintiffs do not oppose staying the current briefing schedule and addressing the briefing schedule at the pre-motion conference related to the anticipated motions to dismiss. As such, the parties anticipate revising the briefing schedule for Plaintiffs' motion at or after the pre-motion conference related to Defendants' anticipated motions.

We thank the Court for its consideration of this request.



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Respectfully submitted,

SEYFARTH SHAW LLP

/s/ Glenn J. Smith

Glenn J. Smith

cc: Plaintiffs' counsel (via ECF)
Defendants' counsel (via ECF)